

REMARKS/ARGUMENTS

Favorable reconsideration of this application is respectfully requested.

Claims 1-24 and 29-40 are pending in this application. Claims 29-40 are allowed. Claims 1, 2, and 18-24 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. patent 6,173,142 to Kawakami. Claims 3, 4, and 9 were rejected under 35 U.S.C. § 103(a) as unpatentable over Kawakami in view of U.S. patent 5,689,791 to Swift. Claims 5-8 and 10-17 were objected to as dependent upon a rejected base claim, but were noted as allowable if rewritten in independent form to include all of the limitations of their base claim and any intervening claims.

Initially, applicants gratefully acknowledge the indication of the allowance of claims 29-40 and of the allowable subject matter of claims 5-8 and 10-17.

Addressing now the rejection of claims 1, 2, and 18-24 under 35 U.S.C. § 102(b) as anticipated by Kawakami, and the further rejection of claims 3, 4, and 9 over Kawakami in view of Swift, those rejections are traversed by the present response.

In the Response filed January 28, 2004, comments were presented to the allowability of the claims over the applied art. Those comments are reiterated below. However, applicants also note that by the present amendments each of independent Claims 1, 23, and 24 is amended by the present response to clarify features recited therein. Specifically, those claims now further recite that the brush contacts the surface due to a weight of the brush roller “whereby a desired amount of bite of said brush is achieved due to only the weight of said brush roller”. That subject matter is fully supported by the original specification at page 8, line 9 to page 9, line 15. Such a feature is believed to even further distinguish the claims over the applied art.

More particularly, neither Kawakami nor Swift disclose or suggest any operation of an amount of bite of a brush being achieved only from a weight of a brush roller. Thus,

amended independent Claims 1, 23, and 24, and the claims dependent therefrom, are believed to clearly distinguish over Kawakami in view of Swift.

Applicants also note the basis of the outstanding rejection is believed to be improper as Kawakami does not indicate a structure in which “said brush roller has no driving motor and thereby rotates only by following a movement of said surface”, as also required in the noted claims. Applicants respectfully submit that although Kawakami does not clearly show or describe whether or not a brush roller includes a driving motor, the rotation of the brush roller appears to be controlled when consideration is given to a relation between the rotation of a member to be cleaned and the brush roller defined specifically. Therefore, applicants respectfully submit that it is not reasonable to determine that the brush roller of Kawakami is driven by the member to be cleaned.

Moreover, Swift discloses a brush roller rotated by its own drive means, as clearly indicated in column 5, lines 7-11 and the description made with reference to Figure 2. Thus, Swift cannot overcome the noted deficiencies in Kawakami.

In such ways, each of independent claims 1, 23, and 24, and the claims dependent therefrom, are believed to further distinguish over the applied art.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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